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EX PARTE OR LATE FILED

September 10, 1999

VIA HAND DELIVERY

Magalie Roman Salas, Esq.  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Room TW-A325  
Washington, D.C. 20554

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SEP 10 1999

FEDERAL COMMUNICATIONS COMMISSION  
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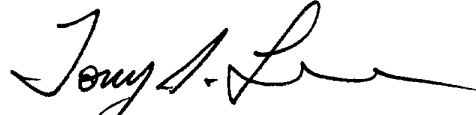
Re: FCC Enhanced 911 Proceeding  
CC Docket No. 94-102  
Comments of Allen Telecom, Inc.

Dear Ms. Salas:

On behalf of Allen Telecom, Inc. ("ATI"), and pursuant to Section 1.1206(b) of the Commission's rules, transmitted herewith are an original and four (4) copies of ATI's comments to be filed in the above-referenced proceeding. Please date-stamp the extra copy of this filing, and return it to us in the enclosed self-addressed stamped envelope.

Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned at (202) 424-7798.

Respectfully submitted,

  
Tony S. Lee

Counsel for Allen Telecom, Inc.

cc: Barbara Reideler (FCC)  
ITS, Inc.  
Joseph Kennedy (ATI)  
Andrew Woessner (ATI)  
Andrew D. Lipman  
William B. Wilhelm, Jr.

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
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Revisions of the Commission's )  
Rules to Ensure Compatibility )  
With Enhanced 911 Emergency )  
Calling Systems )

CC Docket No. 94-102

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FEDERAL COMMUNICATIONS COMMISSION  
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To: The Commission

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**COMMENTS OF ALLEN TELECOM INC.**  
**REGARDING CDMA NETWORK OVERLAY**  
**LOCATION SYSTEMS**

Allen Telecom Inc. ("ATI") hereby respectfully submits the following comments regarding CDMA network-based location systems in the FCC's above-captioned E9-1-1 proceeding.<sup>1</sup>

ATI is a long-standing supplier of equipment to the wireless telecommunications industry and of location solutions that can be integrated into a wireless communications network. ATI, through multiple operating divisions, supplies large volumes of a wide variety of equipment to wireless infrastructure vendors and wireless carriers each year. ATI supported the FCC in the development of Docket 94-102 by providing field data on the capabilities of network overlay location systems. Furthermore, ATI is an active participant in the Wireless E9-1-1 Implementation Ad Hoc ("WEIAD") and in the TIA TR45.2 AHES committees.

ATI is concerned by the numerous comments made regarding the viability of CDMA network-based location systems<sup>2</sup>. ATI has installed its network overlay location system, Geometrix™, in a private network in the Northern Virginia area. In addition to AMPS and TDMA (IS-136), this network is capable of locating CDMA (IS-95) handsets. This overlay network accurately represents a realistic deployment with all installed equipment co-located with operating cellular base stations in this area, ensuring appropriate cell spacing and geometry. Extensive live testing on this network has demonstrated CDMA accuracies within the FCC's mandate.

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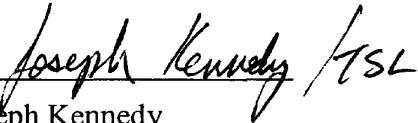
<sup>1</sup> This docket has been designated by the Commission as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules. This filing is being made in accordance with Section 1.1206(b) of the Commission's rules. 47 C.F.R. § 1.1206(b).

<sup>2</sup> See PrimeCo comments (July 2) at 3. See US West comments (July 2) at 3. See AirTouch comments (July 2) at 2. See IDC comments (July 1) at 4. See GTE Wireless comments at the July 28<sup>th</sup> FCC Technology Roundtable.

ATI believes that the Commission should not change the rules of the mandate. ATI believes that the current ruling is technology independent. There are and will always be emerging technologies that promise greater accuracies at a lower cost and market forces should be allowed to drive the fortune of these technologies, when they become available. The intent of the mandate, however, is to enable public safety to better serve wireless subscribers. This can only be done through the timely implementation of location systems that meets the requirements as set forth in CC Docket No. 94-102.

Respectfully submitted,

Allen Telecom Inc.

By  /TSL

Joseph Kennedy  
Vice President, Business Development  
Grayson Wireless  
381 Elden Street  
Herndon, VA 20170

Dated: September 10, 1999